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Corporation and Ocwen Loan Servicing,
LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JULIE CARMEN TORRES, individually,
and on behalf of all other similarly situated,

Plaintiff,

vs.

PHH MORTGAGE CORPORATION, a
New Jersey corporation; OCWEN LOAN
SERVICING, LLC, a Delaware limited
liability company; ROBERTSON,
ANSCHUTZ, & SCHNEID, P.L., a Florida
professional limited liability company;
ROBERTSON, ANSCHUTZ, SCHNEID &
CRANE LLC, a Florida limited liability
company; RAS CRANE, LLC, a Florida
limited liability company; RAS BORISKIN,
LLC, a Florida limited liability company;
and RAS CITRON, LLC, a New Jersey
limited liability company,

Defendants.

Case No.: 3:20-cv-04370-JSC

**STIPULATION TO CONTINUE
DEADLINE TO RESPOND TO
COMPLAINT, AND TO CONTINUE
HEARING ON MOTION FOR
PRELIMINARY INJUNCTION AND
ASSOCIATED DEADLINES;
~~PROPOSED ORDER~~**

Dept.: Courtroom E (15th Floor)

Magistrate Judge: Hon. Jacqueline S. Corley

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiff Julie Carmen Torres, individually, and on behalf of all other similarly situated (“Plaintiff”) and Defendants PHH Mortgage Corporation and Ocwen Loan Servicing, LLC (“PHH Defendants”), by and through their counsel, hereby stipulate (i) to continue the hearing date on Plaintiff’s Motion for Preliminary Injunction (ECF 13), (ii) to extend the deadline for filing and serving the opposition and reply in connection with Plaintiff’s Motion for Preliminary Injunction, and (iii) to continue the deadline to respond to the Complaint as follows:

1 WHEREAS, Plaintiff and the other defendants to this action, Robertson,
2 Anschutz, & Schneid, P.L.; Robertson Anschutz, Schneid & Crane, LLC; RAS Crane, LLC;
3 RAS Boriskin, LLC; and RAS Citron, LLC have already stipulated and agreed to the same
4 extensions of time sought herein;

5 WHEREAS, the PHH Defendants recently retained Troutman Pepper Hamilton
6 Sanders, LLP to represent them in this action;

7 WHEREAS, the PHH Defendants and Plaintiff, by counsel, have agreed to
8 extend the current July 30, 2020 deadline for the PHH Defendants to respond to the Complaint
9 to **August 31, 2020**;

10 WHEREAS, in light of the shelter-in-place orders under which counsel and the
11 parties currently are working and to give the PHH Defendants sufficient time to prepare their
12 response to Plaintiff's motion for preliminary injunction, the parties have agreed to extend the
13 current deadline of July 29, 2020 to respond to Plaintiff's motion for preliminary injunction to
14 **September 3, 2020**, leading to a new reply deadline of **September 10, 2020**;

15 WHEREAS, the parties agree that the modified briefing schedule above
16 necessitates a continuation of the August 20, 2020 hearing on Plaintiff's motion for preliminary
17 injunction, the parties have agreed to continue the hearing date on Plaintiff's motion for
18 preliminary injunction from August 20, 2020 to **September 24, 2020** or as soon thereafter as
19 the matter may be heard;

20 WHEREAS, these proposed continuances will not cause prejudice to any party
21 in this matter;

22 NOW, THEREFORE, IT IS HEREBY STIPULATED by and between the
23 parties, through their counsel that the deadline for the PHH Defendants to file their response to
24 the Complaint shall be August 31, 2020, the deadline for the PHH Defendants to respond to
25 Plaintiff's motion for preliminary injunction (ECF 13) shall be September 3, 2020, the deadline
26 for Plaintiff's reply in support of the motion for preliminary injunction shall be September 10,
27 2020, and the hearing on Plaintiff's motion for preliminary injunction shall be September 24,
28 2020.

1 **IT IS SO STIPULATED.**

2
3 Dated: July 23, 2020

TROUTMAN PEPPER
HAMILTON SANDERS LLP

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5 By: /s/ Kalama M. Lui-Kwan
6 KALAMA M. LUI-KWAN
7 Attorneys for Defendants PHH Mortgage
8 Corporation and Ocwen Loan Servicing,
 LLC

9 Dated: July 23, 2020

CALLAHAN & BLAINE, APLC

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11 By: /s/ Brett E. Bitzer
12 BRETT E. BITZER
13 DANIEL J. CALLAHAN
14 EDWARD SUSOLIK
15 Attorneys for Plaintiff
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~~PROPOSED~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

- The deadline for PHH Defendants to file their response to the Complaint is **August 31, 2020**;
- The deadline for PHH Defendants to respond to Plaintiff's motion for preliminary injunction (ECF 13) is **September 3, 2020**;
- The deadline for Plaintiff's reply in support of the motion for preliminary injunction is **September 10, 2020**;
- The hearing on Plaintiff's motion for preliminary injunction (ECF 13) is continued to **September 24, 2020**, at 9:00 a.m.;

Dated: July 23, 2020


The Honorable Jaqueline S. Correy
United States Magistrate Judge